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IN THE UNITED STATES BANKRUPTCY COURT DISTRICT OF MINNESOTA

In re:	BKY No.: 16-31466

Chapter 11

S. Hemenway, Inc.,

Debtor.

Notice of Hearing and Motion Approving Amended Stipulation for Use of Cash Collateral and Approving Adequate Protection

- 1. S. Hemenway, Inc. (the "Debtor") moves the Court for the relief requested below and gives notice of hearing.
- 2. The Court will hold a hearing on the Debtor's request for relief at 9:30 a.m. on Thursday, June 23, 2016, in Courtroom 2C of the United States Bankruptcy Court, 316 North Robert Street, St. Paul, Minnesota 55101, before the Honorable Katherine A. Constantine.
- 3. Any objection to this motion shall be filed and served by delivery or by mail not later than five (5) days before the hearing date which is Friday, June 17, 2016. UNLESS A RESPONSE OPPOSING THE MOTION IS TIMELY FILED, THE COURT MAY GRANT THE MOTION WITHOUT A HEARING.
- 4. This Court has jurisdiction over this motion pursuant to 28 U.S.C. §§157 and 1334 and Fed.R.Bankr.P. 5005. This proceeding is a core proceeding. The petition commencing this case was filed on May 2, 2016 (the "Filing Date"). The case is now pending in this court.
 - 5. This motion arises under 11 U.S.C. §363(c)(2) and Bankruptcy Rules 2002, 4001(b), 4001(d) and 9014.

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6. The Debtor filed an Expedited Motion for Use of Cash Collateral (Docket No. 7)

on May 3, 2016. The Court has held two hearings on the Debtor's Motion, which occurred May

5, 2016 and June 2, 2016.

7. The Debtor has entered into a Stipulation for the use of cash collateral and to

provide adequate protection with the Internal Revenue Service on May 16, 2016 (Docket No.

22). The Debtor then entered into an Amended Stipulation for the use of cash collateral and to

provide adequate protection with the Internal Revenue Service on May 17, 2016 (Docket No.

26). A copy of the Amended Stipulation is attached to this motion as **Exhibit 1.**

8. By this Motion, the Debtor requests the Court to approve the Amended

Stipulation between the Debtor and the Internal Revenue Service. The Amended Stipulation

provides for the Debtor's use of cash collateral to pay operating expenses and provides adequate

protection to the Internal Revenue Service.

9. The Debtor gives notice that it may, if necessary, call Scott Hemenway, to testify

with respect to the relief sought in this Motion.

WHEREFORE, Debtor moves the Court for an order approving the Amended

Stipulation for use of cash collateral and to provide adequate protection between the Debtor and

the Internal Revenue Service and for such other and further relief the Court determines.

Dated: June 3, 2016.

/e/ Steven B. Nosek By:

Steven B. Nosek (No. 79960)

Attorney for Debtor

2855 Anthony Lane South

Suite 201

St. Anthony, MN 55418

Telephone: (612) 335-9171

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VERIFICATION

I, Scott Hemenway, President of the Debtor named in the foregoing pleading, declare under penalty of perjury that the foregoing pleading is true and correct according to the best of my knowledge, information and belief.

Dated: 6-3-16

Scott Hemenway, President

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UNITED STATES BANKRUPTCY COURT DISTRICT OF MINNESOTA

In Re:

BKY No.: 16-31466

Chapter 11

S. Hemenway, Inc.,

Debtor.

AMENDED STIPULATION REGARDING THE DEBTOR'S USE OF CASH COLLATERAL

- S. Hemenway, Inc. (the "Debtor") and the United States of America, Internal Revenue Service ("IRS"), hereby agree and stipulate as follows:
- A. The Debtor commenced this case on May 2, 2016 (the "Petition Date") by filing a voluntary petition under Chapter 11 of Title 11 of the United States Code (the "Bankruptcy Code"). Since the Petition Date, the Debtor has continued in possession of its property and has operated and managed its business as a debtor-in-possession pursuant to Sections 1107 and 1108 of the Bankruptcy Code.
- B. On May 5, 2016, the Debtor brought a motion (the "Cash Collateral Motion") under Section 363(c) of the Bankruptcy Code and Federal Rule of Bankruptcy Procedure 4001(b) seeking to use cash collateral.
- C. The Cash Collateral Motion stated that both the IRS and Unity Bank hold a secured interest in the Debtor's cash collateral.
- D. In order to provide sufficient time to obtain approval of its proposed plan of reorganization, the Debtor has requested an extension of the time to the use of cash collateral and the IRS has agreed to consent to the Debtor's continued use of cash collateral pursuant to the terms of this stipulation.

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IT IS HEREBY AGREED:

- 1. The IRS consents to the Debtor's use of cash, including cash collateral, consistent with the Debtor's projections attached as **Exhibit A**.
- 2. For purposes of adequate protection, the Debtor will pay to the IRS a minimum of \$9,694.71 on or before the last day of each month in which this stipulation is in effect, which payment will be applied to the secured portion of the Debtor's obligation to the IRS. This obligation to the IRS will accrue interest at the rate of 4% pursuant to 26 I.R.C. §6621. In addition, the Debtor hereby grants the IRS a replacement lien in Debtor's post-petition assets, including without limitation cash and cash equivalents, equipment, contract rights, general intangibles and all other post-petition property of the Debtor, together with the proceeds and products thereof except that this replacement lien shall exclude any causes of action arising out of this bankruptcy filing. Said replacement lien shall be of the same priority, dignity and effect as the IRS's pre-petition liens. This replacement lien shall be in addition to the liens that the IRS had in the assets and property of the Debtor as of the petition date, which liens extend to and encumber the proceeds and products of the property of the Debtor in existence at the time the bankruptcy petition was filed.
- 3. The Debtor shall file any past due tax returns (including, but not limited to, income, excise, employment and unemployment returns) and will provide proof of filing to the IRS.
- 4. The Debtor will pay each federal tax deposit as it accrues, when payroll is made, through a federal depository and will submit proof of deposit to the IRS within seven (7) working days of the deposit.

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- 5. The Debtor shall file all tax returns for the periods ending after the filing of the bankruptcy petition on or before the due date, and shall pay any balance due upon filing of the return. Proof of filing and payment will be provided to the IRS within seven (7) working days of filing and payment.
- 6. The Debtor's failure to timely perform or otherwise timely comply with any of the conditions of adequate protection provided in this stipulation is a default. If the Debtor defaults in any of the conditions of adequate protection provided in this stipulation, the IRS must provide the Debtor and Debtor's counsel with written notice of such default. If the Debtor has not cured such default within ten (10) business days after such notice of default is provided, the IRS may pursue available remedies for the Debtor's alleged breach of this Stipulation.
- 7. If the Debtor should need to make any expenditure outside the ordinary course of business, the Debtor shall seek permission in writing for such additional expenditure from the IRS. The IRS agrees to review and respond to any such request(s) for an additional expenditure(s) within a reasonable time, and the IRS agrees that its approval of any such expenditure(s) via e-mail, or via any other written format, will be binding.
- 8. All returns, monthly payments, monthly reports, proof of deposits, proof of insurance, tax returns, financial statements required by this stipulation to be filed with, or submitted to, the IRS shall be sent or delivered to:

Pat Patton Insolvency Unit, Internal Revenue Service 30 East 7th Street, Suite 1222 Stop 5700 STP St. Paul, MN 55101

- 9. The Debtor and the IRS agree to submit the order attached hereto as **Exhibit B** for entry by the Court and the parties hereby consent to the Court's entry of such order.
- 10. Any breach of this Stipulation by any party will entitle any party to seek an order from the Court enforcing the terms of this Stipulation, including but not limited to immediately terminating the Debtor's right to use cash collateral as set forth in the Stipulation.
- 11. The Debtor and the IRS agree that, pursuant to Local Rule 9011-4(f), each of the undersigned hereby authorizes the e-filing of this document with their electronic signatures affixed below.

Dated: May 17, 2016.

/e/ Steven B. Nosek
Steven B. Nosek, #79960
2855 Anthony Lane South, Suite 201
St. Anthony, MN 55418
(612) 335-9171
snosek@noseklawfirm.com
ATTORNEY FOR THE DEBTOR

Dated: May 17, 2016.

ANDREW M. LUGER United States Attorney

/e/ Roylene A. Champeaux
Roylene A. Champeaux, #154805
Assistant United States Attorney
600 U.S. Courthouse
300 South Fourth Street
Minneapolis, MN 55415
Telephone: (612) 664-5685
roylene.champeaux@usdoj.goy

ATTORNEY FOR THE UNITED STATES OF AMERICA, INTERNAL REVENUE SERVICE

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UNITED STATES BANKRUPTCY COURT DISTRICT OF MINNESOTA

In Re:

Case No. 16-31466

Chapter 11

S. Hemenway, Inc., Debtor.

ORDER APPROVING THE USE OF CASH COLLATERAL

This matter came before the Court on the Debtor's motion for an order authorizing the Debtor to use cash collateral and provide adequate protection.

Appearances were noted on the record.

The Debtor and the United States of America, the Internal Revenue Service ("IRS") have entered into a Stipulation Regarding the Debtor's Use of Cash Collateral (the "Stipulation"). The Stipulation has been filed with the Court and is part of the record herein.

Based on the file and record herein,

IT IS ORDERED:

- 1. The Debtor is authorized to use cash, including cash collateral, subject to the liens of the IRS, consistent with the terms of the Stipulation.
- 2. For purposes of adequate protection, the Debtor shall pay to the IRS a minimum of \$9,694.71 on or before the last day of each month in which this stipulation is in effect, beginning May 2016, which payment will be set off against the secured portion of the Debtor's obligation to the IRS.

EXHIBIT B

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In addition, the Debtor is authorized to grant the IRS a replacement lien in Debtor's postpetition assets, including without limitation cash and cash equivalents, equipment, contract
rights, general intangibles and all other post-petition property of the Debtor, together with the
proceeds and products thereof except that this replacement lien shall exclude any causes of
action arising out of this bankruptcy filing. Said replacement lien shall be of the same priority,
dignity and effect as the IRS' pre-petition liens. This lien and security agreement shall be in
addition to the liens that the IRS had in the assets and property of the Debtor as of the petition
date, which liens extend to and encumber the proceeds and products of the property of the
Debtor in existence at the time the bankruptcy petition was filed. The replacement liens granted
by the Debtor to the IRS will be deemed properly perfected without further act or deed on the
part of the Debtor or the IRS.

3. Any breach of the Stipulation by any party will entitle any party to seek an order from this Court enforcing the terms of the Stipulation, including but not limited to immediately terminating the Debtor's right to use cash collateral as set forth in the Stipulation.

Dated:	
	Katherine A. Constantine
	United States Bankruptcy Judge

UNITED STATES BANKRUPTCY COURT DISTRICT OF MINNESOTA

In Re: BKY No.: 16-31466

Chapter 11

S. Hemenway, Inc.,

Debtor.

CERTIFICATE OF SERVICE

I hereby certify that on June 3, 2016 I caused a copy of **Notice of Hearing and Motion Approving Amended Stipulation for Use of Cash Collateral and Approving Adequate Protection; Verification; Exhibit 1; and Proposed Order** to be filed electronically with the Clerk of Court through ECF, and that ECF will send an e-notice of the electronic filing to the following:

US Trustee: ustpregion12.mn.ecf@usdoj.gov, ecfbkup@comcast.net

Sarah J Wencil: <u>Sarah.J.Wencil@usdoj.gov</u>

Roylene A. Champeaux: Roylene.Champeaux@usdoj.gov,

karen.malikowski@usdoj.gov,

usamn.ecfbankruptcy@usdoj.gov, Muriel.holland@usdoj.gov,

Isaac.mcgurrand-hanson@usdoj.gov

I further certify that I caused a copy of the **Notice of Hearing and Motion Approving Amended Stipulation for Use of Cash Collateral and Approving Adequate Protection; Verification; Exhibit 1; and Proposed Order** to be faxed, emailed and/or mailed by US Mail to the following:

S. Hemenway, Inc.	AiTech	AmTrust North America
Scott Hemenway	PO Box 390296	Attn: Accounts Receivable
Scott.h@visitingangelsmn.com	Edina MN 55439	800 Superior Ave E-21st Floor
	Fax: 1-800-731-5601	Cleveland OH 44144
		Fax: 1-212-220-7130
Capital One	Clearstar	Dakota Electric Association
PO Box 6492	5955 Shiloh Road East	PO Box 64427
Carol Stream IL 60197	Suite 104	Saint Paul MN 55164-0427
Fax: 1-888-259-3021	Alpharetta GA 30005	Fax: 651-463-6256
	Email:	
	accounting@clearstar.net	

Delta Dental of Minnesota	Frederick & Rosen LTD	Freedom Services
Attn: Billing	5922 Excelsior Blvd	PO Box 3110
NW 5772	Minneapolis MN 55416	Burnsville MN 55337
PO Box 1450	Fax: 952-929-0522	Fax: 952-890-7344
Minneapolis MN 55485-5772	Tur. 702 727 Volume	1 da. 752 070 7544
Fax: 1-888-819-6257		
Health Partners	Home Care Pulse	Imagine IT, Inc.
NW 3600	1216 Stocks Ave	2950 Metro Drive, #308
PO Box 1450	Suite 2	Bloomington MN 55425
Minneapolis MN 55485-3600	Rexburg ID 83440	Fax: 952-905-3900
Fax: 1-248-733-6000	Email:	
	accounting@homecarepulse.com	
Institute for Professional	Lexus Financial	Living Assistance
5109 NE 82nd Avenue	PO Box 5855	Services Inc
Suite 201	Carol Stream IL 60197	937 E Haverford Rd
Vancouver WA 98662	Fax: 1-319-221-6979	Suite 200
Fax: 1-360-953-8105		Bryn Mawr PA 19010
		Fax: 1-610-853-2760
M&E Realty Co.	Purchase Power	Schrager Legal PLLC
4210 W Old Shakopee Road	PO Box 856042	222 South 9th Street
Burnsville MN 55437	Louisville KY 40285-6042	Suite 1600
Fax: 952-881-8114	Email:	Minneapolis MN 55402
	orderprocessing@purchasingpower.co	Fax: 612-338-0359
	<u>m</u>	
The Hanover Insurance Group	Verizon	World Pay
PO Box 580045	505 Highway 169 N	600 Morgan Falls Road
Charlotte NC 28258	Plymouth MN 55441	Suite 260
Fax: 1-508-855-8078	Fax: 1-847-841-0821	Atlanta GA 30350
		Fax: 1-866-357-6337
MN Dept Of Revenue	IRS District Counsel	IRS District Director
551 Bky Section	380 Jackson Street	Room 320 Stop 5700
PO Box 64447	650 Cray Plaza	30 7 th Street E #1222
St Paul MN 55164	St Paul MN 55101	St Paul MN 55101
Mdor.collection@state.mn.us	No Fax or Email	No Fax or Email
	LITT'S DO 1	Wells Fargo Bank NA
US Attorney	Unity Bank	\mathbf{c}
US Attorney 300 S 4 th St #600	Kevin G. Honius – Vice President	Business Direct Division
US Attorney 300 S 4 th St #600 Minneapolis MN 55415	Kevin G. Honius – Vice President 7101 Washington Ave S	Business Direct Division PO Box 29482 MAC
US Attorney 300 S 4 th St #600	Kevin G. Honius – Vice President 7101 Washington Ave S Edina MN 55439	Business Direct Division PO Box 29482 MAC S4101-08C
US Attorney 300 S 4 th St #600 Minneapolis MN 55415	Kevin G. Honius – Vice President 7101 Washington Ave S	Business Direct Division PO Box 29482 MAC

khonius@unitybanking.com

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Wells Fargo Bank NA	
Attn: Ryan A. Kelley	
VP Operations Risk Cons.	
PO Box 29482	
Phoenix AZ 85038	

Dated this 3rd day of June, 2016.

/e/ Steven B. Nosek Steven B. Nosek, #79960 2855 Anthony Lane South, Suite 201 St. Anthony, MN 55418 (612) 335-9171 ATTORNEY FOR DEBTOR snosek@noseklawfirm.com